

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | No. <u>24-mj-2388</u> |
| |) | |
| |) | JUDGE HOLMES |
| SKYLER PHILIPPI |) | |

**UNITED STATES' MOTION FOR A DETENTION HEARING
AND FOR DETENTION OF THE DEFENDANT**

COMES NOW the United States of America by Thomas J. Jaworski, United States Attorney, and Joshua A. Kurtzman, Assistant United States Attorney, and moves this Court for detention of the Defendant under 18 U.S.C. § 3142(f)(1)(A) & (B). For cause, the United States submits that the Defendant is charged in the Criminal Complaint with two offenses listed in Title 18, United States Code, Section 2332b(g)(5)(B) for which a maximum term of imprisonment of life imprisonment is prescribed. As such, since these offenses are enumerated under § 3142(f)(1), there is no question that the Government is entitled to a detention hearing on this matter.

Additionally, the United States would submit that – by operation of 18 U.S.C. § 3142(e)(3)(C) – a rebuttable presumption exists before this court that “no condition or combination of conditions will reasonably assure the safety of any other person and the community.” The United States intends to rely on the presumption at the detention hearing in this matter.

The United States also respectfully requests that, should a hearing be necessary, the Court grant the United States a continuance in this matter of three days so that the United States may adequately prepare for the hearing on this motion.

Respectfully submitted,

THOMAS J. JAWORSKI
United States Attorney

By: /s/ Joshua A. Kurtzman
JOSHUA A. KURTZMAN
Assistant U.S. Attorney
719 Church Street, Suite 3300
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served electronically and by hand to counsel for defendant via CM/ECF on November 4, 2024.

/s/ Joshua A. Kurtzman
JOSHUA A. KURTZMAN